

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

RICHARD BANKHEAD,

PLAINTIFF,

AMERICAN SUZUKI MOTOR CORP., et al.,

DEFENDANT.

CASE NO.: 03: 07 CV208-MHT

**PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET
OF INTERROGATORIES**

1. Name: Richard E. Bankhead
Date of Birth: [REDACTED]
S.S.N.: [REDACTED]
2. Heather McKenzie
222 Lee Road 282
Salem, AL 36877
3. I had been working at Extreme Power Sports in Columbus, GA. I was employed at Extreme Power Sports at the time.
4. Byran Oschman

G&B Customs
1111 13th Street
Columbus, GA 31901
5. Blue Cross Blue Shield (Health Insurance)

Progressive Insurance (motorcycle)
6. No felony convictions
7. To my knowledge, I have never been a party to a lawsuit.
8. I received my high school diploma online through Rockville Online. I attended Smith's Station High School through 11th grade. I attended school in California in 8th grade and Mississippi in 9th grade. I lived with family due my mother's liver transplant.

9. I am not currently employed at this time. Prior to the accident , I was employed with Extreme Power Sports in Columbus, Georgia. My boss was Bryan Oschman.
10. The motorcycle was driven approximately 22 miles. Eleven of those miles had been a test drive.
11. Bryan Oschman
Extreme Power Sports
Columbus, GA

G&B Customs
1111 13th Street
Columbus, GA 31901
12. The Plaintiff is the only individual to have custody of the motorcycle.
13. No
14. There have been no formal tests. I have let individuals at G&B view the motorcycle as well as Byran Oschman.
15. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
16. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
17. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
18. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.
19. No
20. Unknown at this time, Plaintiff will supplement this response when requested identities are ascertained or subject to the Court's Pre-Trial Order.
21. I suffered bodily injury and incurred medical bills. I suffered mental anguish and pain and suffering. My medical bills total approximately \$3,537.29.
22. The Plaintiff objects to this interrogatory as it calls for a legal conclusion in which Plaintiff is not qualified to answer or otherwise respond.

“/s/” Richard E. Bankhead
Plaintiff

/s/ Stewart S. Wilbanks
Attorney for Plaintiff
Richard Bankhead

Of Counsel:

Stewart S. Wilbanks
Dillard & Associates, LLC
2015 2nd Avenue North
4th Floor
Birmingham, AL 35203
(205) 251-2823 (Telephone)
(205) 251-3832 (Facsimile)
dillardandassoc@aol.com

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CMF/ECF system which will send notification of such filing to the following:

John D. Mayo
Lightfoot, Franklin & White
The Clark Building
400 North 20th Street
Birmingham, AL 35203

Respectfully submitted,
/s/ Stewart S. Wilbanks
Dillard & Associates, LLC
2015 2nd Avenue North
4th Floor
Birmingham, AL 35203
(205) 251-2823 (Telephone)
(205) 251-3832 (Facsimile)
dillardandassoc@aol.com